

REMARKS

Applicants have studied the Office Action dated May 17, 2004, and have made amendments to the claims. By virtue of this amendment, claims 1-4, 7-9, 11-18, 21-23, 25-32, 35-37, and 39-42 are pending and claims 1-4, 7, 9, 11, 15-18, 21, 23, 25, 29-32, 35, 37 and 39 have been amended. It is submitted that the application, as amended, is in condition for allowance. Reconsideration and allowance of all of the claims in view of the above amendments and the following remarks are respectfully requested.

Applicants wish to thank the Examiner for a telephonic interview on August 18, 2004. Although no specific claim limitation was discussed, the applicants appreciate the general discussion on the disclosed subject matter of the application. The applicants have amended the claims to more specifically claim what is described in the specification. Based on the discussions with the Examiner, applicants believe that the claims as amended better define the invention as to clearly distinguish over the cited prior art.

Claims 1-4, 7-9, 15-18, 21-23, 29-32, and 35-37 were rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent Application Publication No. 2002/0077923 to Siegel et al. ("the Siegel et al. reference") in view of U.S. Patent Application Publication No. 2002/0040325 to Takae et al. ("the Takae et al. reference"). This rejection is respectfully traversed.

Embodiments of the present invention are directed to an integrated multi-functional management tool using a series of modules to allow different access and manipulations to the customer and product databases over the Internet for client representatives. Certain modules allow client representatives to receive phone calls or emails from customers. These customer contacts are not pre-scripted, pre-formatted, or preset automated responses. Instead, the present invention provides a tool to better service customers after a product has been purchased by recording all customer contacts, having product information available for answering questions, and providing updates on any service requests such as repairs or returns. In addition, because the multi-functional management tool is accessible over the Internet, back-end personnel in charge of logistics or repairs can also access the management tool from different locations to update the

product information including the amount of inventory of a product remaining at the warehouse location. Thus, the embodiments of the present invention allow back-end product management to be tied with customer service features.

Amended independent claim 1 recites "a method for managing customer and product information over the Internet using a multi-functional customer relationship management tool, comprising ... creating a plurality of modules for use in the multi-functional customer relationship management tool, wherein each module allows specific access and manipulation of the customer and product databases; receiving a random, non-automated contact from a customer through a telephone call or by an email; accessing at least one of the plurality of modules in the multi-functional customer relationship management tool to allow a client representative to review previous customer contacts, product information and servicing information associated with the customer; accessing at least one of the plurality of modules in the multi-functional customer relationship management tool to allow a first client representative to review previous customer contacts, product information and servicing information associated with the customer; allowing the first client representative to update the customer database from information received from the customer to add or modify a specific customer record logging the customer contact and recording any new product or warranty purchase information, service request, return merchandise request, or complaint using one of the plurality of modules; and allowing a second client representative located at a different site from the first client representative to access the multi-functional customer relationship tool over the Internet to further update a product record using at least one of the plurality of modules to update the inventory information of a product at a warehouse location" (emphasis added). Independent claims 15 and 29 have been amended to recite similar limitations. Support for the amended claims exists throughout the original specification. For example, page 5, lines 1-3 states: "a server 10 is linked to a customer computer 15, a manufacturer/client computer, repair facility computer, call center computer 40, and warehouse computer 45 (collectively "user computers" using a network 50, such as the Internet." In addition, on page 17, lines 14-18 states: "the inventory management module 270 is designed to administer the inventory in a warehouse from purchasing, carrying, picking, packing, and shipping of products. The module 270 provides real-time inventory levels, and enables product managers to manage produce specs, quantities, promotions, and categorization." No

new matter was added. The Siegel et al. reference nor the Takae et al. reference disclose, teach or suggest an integrated multi-functional customer relationship management tool using a series of modules to allow different access and manipulations to the customer and product databases. Furthermore, neither the Siegel et al. reference nor the Takae et al. reference disclose, teach or suggest allowing a second client representative located at a different site from the first client representative to access the multi-functional customer relationship tool over the Internet to further update a product record using at least one of the plurality of modules to update inventory information of a product at a warehouse location.

The Siegel et al. reference is directed to a customer/product registration system, which also offers to sell the customer additional products during the registration process. Specifically, the Siegel et al. reference is directed to performing an on-line registration over an open computer network (e.g. the Internet) of an item previously purchased by a customer. After registration, the system is able to provide a list of purchasable items to the registering customer for additional purchase. This on-line registration is preformatted and the response to the registration is automated. The Siegel et al. reference explains: "at about the time of making an initial purchase, a customer is often inclined to additionally purchase product upgrades or enhancements, or additional products that can enhance the use and enjoyment of the initially purchased product. The present invention provides a method of performing on-line registration over an open computer network of an item previously purchased by a customer... Upon receiving a completed registration form from the customer, a database is searched to generate a list of purchaseable items. The selection of the list of purchaseable items is based at least in part on the identifier that identifies the purchased item" (See page 1, paragraphs 5 & 6). The Siegel et al. reference focuses on registering customer product purchase information and attempting to make additional sales while a customer registers through a web page. As the Examiner noted in the Office Action on page 2, line 15 – page 3, line 2, nowhere in the cited sections of the Siegel et al. reference describe, teach, suggest or otherwise render obvious the claimed subject matter of receiving a random, non-automated contact from a customer through a telephone call or by an email; accessing at least one of the plurality of modules in the multi-functional customer relationship management tool to allow a first client representative to review previous customer contacts, product information and servicing information associated with the customer; and allowing the

first client representative to update the customer database from information received from the customer to add or modify a specific customer record logging the customer contact and recording any new product or warranty purchase information, service request, return merchandise request, or complaint using one of the plurality of modules" (emphasis added). Accordingly, it is respectfully submitted that amended independent claims 1, 15, and 29 (and thus dependent claims 2-4, 7-9, 16-18, 21-23, 30-32, and 35-37) are patentable over the Siegel et al. reference.

The Takae et al. reference does not make up for the deficiencies of the Siegel reference. The Takae et al. reference is directed to a product registration method recorded at the time of customer purchase and warranty administration based on the registered product information. Specifically, the Takae et al. reference states in paragraph [0056], [0057]: "In step S102, ... the shop 30 creates a new purchase number based on the decision of the customer at the cashier. After the communication means 35 of the shop 30 transmits the purchase number and the e-mail address of the service center 100 in the step S102, the communication means 35 automatically receives the user information from the customer-cellular phone 40 and then transmits purchased product information concerning the product that the customer purchased, the purchase number, and the user information" (emphasis added). In paragraph [0062], the Takae et al. reference states: "from the user registration registered by the customer-cellular phone 40, the service center 100 can maintain the warranty of the product that the customer purchased, instead of the conventional way in that the customer maintains a warranty paper sheet by oneself." Further, the Takae et al. reference shows how the warranty administration can be automated in paragraph [0073]-[0077], which states: "the service center 100 obtains the warranty period based on the purchase number and then sends the customer-cellular phone 40 a confirmation message including the warranty period, contents for confirming whether or not the product is repaired within the predetermined period and contents for confirming whether or not the customer wants to repair the product at this time. The confirmation message sent to the customer-cellular phone may include at least the following four request items: 1. want to repair 2. do not repair 3. request to collect the product 4. delete purchased product information. In other words, the Takae et al. reference is directed using an automated registration and warranty administration system to alleviate or eliminate personal contacts with the customer. The system in the Takae et al. references teaches away from creating a customer relationship management tool that helps

provide better, more personal customer contact when the customer reaches the client representative through a telephone call or email.

However, more importantly, the Takae et al. patent does not describe a means to tie in the background logistics of the product with the customer service features. Nowhere in the cited sections of the Takae et al. reference describe, teach, suggest or otherwise render obvious the claimed subject matter of a multi-functional customer relationship management tool which can be used to handle a contact from a customer through a telephone call or by an email; accessing at least one of the plurality of modules in the multi-functional customer relationship management tool to allow a first client representative to review previous customer contacts, product information and servicing information associated with the customer; and allowing the first client representative to update the customer database from information received from the customer to add or modify a specific customer record logging the customer contact and recording any new product or warranty purchase information, service request, return merchandise request, or complaint using one of the plurality of modules and allowing a second client representative located at a different site from the first client representative to access the multi-functional customer relationship tool over the Internet to further update a product record using at least one of the plurality of modules to update inventory information of a product at a warehouse location" (emphasis added). Accordingly, it is respectfully submitted that amended independent claims 1, 15, and 29 (and thus dependent claims 2-4, 7-9, 16-18, 21-23, 30-32, and 35-37) are patentable over the Takae et al. reference.

Claims 2, 16, and 30 are further distinguished over the Siegel et al. and Takae et al. references. Claims 2, 16, and 30 recite that "wherein the plurality of modules available to the at least one client representative include at least four members of a set of modules comprising a customer interaction module, a return merchandise management module, a warranty administration module, an e-mail module, an inventory management module, a reporting system module and a credit card processing module."

It is respectfully submitted that the Siegel et al. and Takae et al. references do not suggest the limitations of claims 2, 16, and 30. Nowhere in the cited sections of the Siegel et al. and

Takae et al. references disclose, teach or suggest having available at least four modules from the list of possible modules to service the customer. The Siegel et al. reference describes only three functions that might be considered modules (i.e. the automated registration system, additional product suggestion function, and a shopping cart). In addition, the Takae et al. reference describes only two functions that might be considered modules (i.e. automated customer registration function and the warranty service function). The Examiner stated on page 4, lines 8-9 of the Office Action that paragraph [0057] of the Takae et al reference describes a e-mail module and paragraph [0067] of the Takae et al. reference describes an inventory management module. The applicants respectfully disagree. Paragraph [0057] reads: "the customer-cellular phone receives the purchase number and the e-mail address of the service center 100 (step 103). The customer cellular phone 40 sends the shop 30 a telephone number, an e-mail address, a name, and the like as user information of the customer address and the like as user information of the customer (step S104)" (emphasis added). The Takae et al. reference does not disclose a separate e-mail module to handle e-mails. Instead, the Takae et al. teaches only that an e-mail address can be part of the user information. Similarly, paragraph [0067] of the Takae et al. reference reads: "In Fig. 4, a purchased product list 60 for a telephone number '090-1111-1111' of a customer 'Fuji, Michiko' is displayed at the customer-cellular phone 40." An output of purchased products in the customer record cannot be considered an inventory management module as defined in the specification of the present application. Moreover, even if the Siegel et al. reference and the Takae et al. reference may disclose a particular module similar in function to one of the claimed modules, one of ordinary skill would not be able to readily combine the various functions into a single multi-functional customer relationship management tool having at least four modules of support. Accordingly, it is respectfully submitted that claims 2, 16, and 30 are further patentable over the Siegel et al. and Takae et al. references.

Therefore, it is respectfully submitted that the rejection of claims 1-4, 7-9, 15-18, 21-23, 29-32, and 35-37 under 35 U.S.C. § 103(a) should be withdrawn.

Claims 11-14, 25-28, and 39-42 were rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent Application Publication No. 2002/0077923 to Siegel et al. ("the Siegel et al. reference") in view of U.S. Patent Application Publication No. 2002/0040325 to Takae et al.

("the Takae et al. reference") and further in view of U.S. Patent Application Publication No. 2003/0061104 to Thomson et al. ("the Thomson et al. reference"). This rejection is respectfully traversed.

Claims 11-14, 25-28, and 39-42 depend from independent claims 1, 15, and 29. Claims 1, 15, and 29 have been patentably distinguished over the Siegel et al. and Takae et al. references, as discussed above. Accordingly, claims 11-14, 25-28, and 39-42 are also distinguished over the Siegel et al. and Takae et al. references.

The Thomson et al. reference does not make up for the deficiencies of the Siegel et al. and Takae et al. references. The Thomson et al. reference is directed to an electronic warranty administrator that automates the process of coordinating customer warranty issues and the servicing of defective products. The Examiner specifically cited the Thomson et al. reference for the proposition for "accessing a return merchandise management module" and "producing a printable sheet with a bar code identifying a returned product using a commercial bar code font to code the bar code" or "producing a printable sheet with information on the purchase of the product" or "producing a report based on information from the customer and product records." Nowhere in the cited sections of the Thomson et al. reference describe, teach, suggest or otherwise render obvious the claimed subject matter of a multi-functional customer relationship management tool which can be used to handle a contact from a customer through a telephone call or by an email; accessing at least one of the plurality of modules in the multi-functional customer relationship management tool to allow a first client representative to review previous customer contacts, product information and servicing information associated with the customer; and allowing the first client representative to update the customer database from information received from the customer to add or modify a specific customer record logging the customer contact and recording any new product or warranty purchase information, service request, return merchandise request, or complaint using one of the plurality of modules and allowing a second client representative located at a different site from the first client representative to access the multi-functional customer relationship tool over the Internet to further update a product record using at least one of the plurality of modules to update inventory information of a product at a warehouse location" (emphasis added) as recited in the independent base claim. Accordingly, it

is respectfully submitted that dependent claims 11-14, 25-28, and 39-42 are also patentable over the Thomson et al. reference.

Claims 11, 25, and 39 are also further distinguished over the Siegel et al., Takae et al., and Thomson et al. references. Claims 11, 25, and 39 recite that "accessing a return merchandise management module; and producing a printable sheet with a bar code identifying a returned product using a commercial bar code font to code the bar code" (emphasis added). As described in the specification on page 15, lines 18-22: "by using commercial bar code font to code the RMA number, the repair facility can simply print a bar code label from the return merchandise management module 230 and place it on the returned product."

It is respectfully submitted that the Siegel et al. and Thomson et al. references do not suggest the limitations of claims 11, 25, and 39. Claims 11, 25, and 39 describe a cost-savings method of tracking products that are returned for repair or service. Rather than having to buy a separate, expensive bar coding system, the integrated multi-functional management tool described in the current application incorporates a simple bar code function that allows the client representative to simply produce a printable sheet with a bar code identifying a returned product using a commercial bar code font to code the bar code. Although the Examiner cited the Thomson et al. reference to describe the use of bar codes to identify products, nowhere in the cited sections of the Thomson et al. references disclose, teach or suggest producing a printable sheet with a bar code identifying a returned product using a commercial bar code font to code the bar code. In fact, a search of the Thomson et al. reference produced no mention of bar codes. Instead, the cited sections of the Thomson et al. reference only describe how a customer can track the progress of repair through a customer interface. There is no teaching on how the Thomson et al. reference actually tracks the progress of the repair. Accordingly, it is respectfully submitted that claims 11, 25, and 39 are further patentable over the Siegel et al. and Thomson et al. references.

Therefore, it is respectfully submitted that the rejection of claims 11-14, 25-28, and 39-42 under 35 U.S.C. § 103(a) should be withdrawn.

Therefore, in light of the above remarks, it is respectfully submitted that claims 1-4, 7-9, 11-18, 21-23, 25-32, 35-37, and 39-42 are in condition for allowance. Reexamination and reconsideration of the application, as amended, are requested.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Northridge, California, telephone number (818) 576-4110, to discuss the steps necessary for placing the application in condition for allowance.

Respectfully submitted,

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